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May 3, 2005

**HAND DELIVER**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, Massachusetts 02110

Re: Service Quality Standards - D.T.E. 04-116

Dear Secretary Cottrell:

Enclosed please find a copy of the responses of The Berkshire Gas Company to the DTE-A First Set of Information Requests of the Department of Telecommunications and Energy for filing in the above-referenced proceeding. These responses are also being submitted electronically.

Please call me if you require further assistance with respect to this matter.

Thank you for your consideration.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP

By: \_\_\_\_\_  
James M. Avery

JMA/cdw

Enclosure

cc: Andrew O. Kaplan, Esq., General Counsel (w/enc via hand delivery)  
Jody Stiefel, Esq., Hearing Officer (w/3 enc via hand delivery)  
Karen L. Zink, President, COO and Treasurer (w/enc)  
Richard E. Nasman, Director of Operations (w/enc)  
Service List

# 1360578 v1 - AVERYJM - 070652/0030

**Department of Telecommunications and Energy  
First Set of Information Requests**

**THE BERKSHIRE GAS COMPANY  
DTE 04-116**

**Witness:** Richard E. Nasman  
**Date:** May 3, 2005

**Question**

**DTE A 1-1:** Regarding customer notice and customer service guarantees, please describe the following:

- a) the process that would be required (1) to ensure accurate notification of planned interruptions to customers on the affected circuit, and (2) to accurately track and provide a customer credit to all affected customers of record; and
- b) any proposed new process to ensure accurate appointment notification, rescheduling appointment, and credit for service appointment service guarantee.

**Response:** a) Berkshire is responding to this request only with respect to the aspects that relate to natural gas utilities. There are generally no "planned outages" for natural gas customers except for service tie-overs or meter changes. Typically all distribution main related work is performed to provide for continuous service without interruption. If it is known that a distribution main or gas service will be interrupted for non-emergency service, the Company will notify customers by one of several means, including (1) calling or visiting the customer to notify them of the planned outage or (2) the posting of a "Neighborhood Notice" door hanger at the customer location to notify them of pending construction.

Customers not notified of planned outages receive a credit of \$25.00. The Company's internal auditing department verifies the application of this process.

- b) Berkshire maintains appropriate processes for scheduling and tracking appointments and planned outages. Berkshire credits customer accounts for missed appointments and any failure to notify a customer with respect to a planned outage after being advised of a situation where notice of a planned outage was not delivered. The Company has not proposed any changes to its currently effective procedures.

**Department of Telecommunications and Energy  
First Set of Information Requests**

**THE BERKSHIRE GAS COMPANY  
DTE 04-116**

**Witness:** Richard E. Nasman  
**Date:** May 3, 2005

**Question**

**DTE A 1-2:** Regarding standardization of service quality benchmarks, please identify those service quality measures that could be standardized on a state-wide basis. Explain.

**Response:** As reflected in the Company's initial and reply comments in this proceeding, Berkshire submits that the only SQ measure that remains appropriate for standardization is the odor call response standard. Each gas utility is subject to varying operating conditions, including location, geography, system design and weather. Thus, it is impracticable to establish meaningful standard benchmarks for other SQ measures. Also, as noted, major changes to SQ requirements would alter the terms of established PBR rate plans such as the Price Cap Mechanism Plan approved for the Company in 2002. Changes to SQ standards should be imposed in the context of a comprehensive evaluation of an overall rate plan.

**Department of Telecommunications and Energy  
First Set of Information Requests**

**THE BERKSHIRE GAS COMPANY  
DTE 04-116**

**Witness:** Richard E. Nasman  
**Date:** May 3, 2005

**Question**

**DTE A 1-3:** Please refer to the existing Service Quality Guidelines, Attachment 1, at 15-16, where the electric distribution companies are required to report outage information.

- a) Comment on whether the required outage information in the Service Quality Guidelines is adequate and correlates to the outage information that local electric distribution companies maintain and use for calculating service quality calculation, including system average interruption duration index ("SAIDI"), system average interruption duration index ("SAIFI"), customer average interruption frequency index, and momentary average interruption frequency;
- b) If the required outage information is not considered adequate, please provide a list of additional outage information that would be necessary to correlate to the outage information used in the service quality calculation.

**Response:** This information request does not apply to natural gas companies.

**Department of Telecommunications and Energy  
First Set of Information Requests**

**THE BERKSHIRE GAS COMPANY  
DTE 04-116**

**Witness:** Richard E. Nasman  
**Date:** May 3, 2005

**Question**

**DTE A 1-4:** Regarding the proposed IEEE Standard 1366-2003, please explain:

- a) its level of conformance to the level of minimum performance required under the existing Service Quality Guidelines, i.e., performance level should not be below those levels that existed in 1997 or the existing SAIDI and SAIFI benchmarks;
- b) whether this proposed IEEE standard meets the statutory requirement of minimum performance measurements; and
- c) whether this standard provides an incentive for local electric distribution companies to avoid minimizing interruption durations once the threshold hits a low point and window for the excludable events increase.

**Response:** This information request does not apply to natural gas companies.